

PROSKAUER ROSE LLP

A NEW YORK LIMITED LIABILITY PARTNERSHIP
Lawrence R. Sandak, Managing Resident Partner

One Newark Center
Newark, NJ 07102-5211
Telephone 973.274.3200
or 212.736.8185
Fax 973.274.3299

BOCA RATON
BOSTON
CHICAGO
LONDON
LOS ANGELES
NEW ORLEANS
NEW YORK
PARIS
SAO PAULO
WASHINGTON

Steven Yarusinsky
Senior Counsel

Direct Dial 973.274.3265
syarusinsky@proskauer.com

July 31, 2008

By E-Filing & Regular Mail

The Honorable William H. Pauley III, U.S.D.J.
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2210
New York, New York 10007

Re: Virupaksha Raparathi v. Rabobank International
Docket No. 08 Civ. 3323 (WHP)

Dear Judge Pauley:

This office represents the Defendant Rabobank International in the above referenced matter. We are writing pursuant to Your Honor's instructions in the May 12, 2008 Order For Initial Pretrial Conference that the parties file a written report outlining their discovery plan. We have conferred with Plaintiff's counsel and respectfully submit the following joint discovery plan:

Initial disclosures to be served on or before July 28, 2008;

Interrogatories and Demands for Production of Documents to be served on or before August 7, 2008;

All fact discovery to be completed by December 19, 2008; and

Expert discovery to be completed by February 27, 2009.

The parties are currently discussing the discovery of electronically stored information and will advise the Court if any issues arise which cannot be resolved between the parties.

Respectfully submitted,

s/ Steven Yarusinsky
Steven Yarusinsky

SY/ln

cc: John A. Berenbaum, Esq. (via fax & regular mail)